

Marshall E. Keller, WSB #7-6406
Keller Law Firm, P.C.
P.O. Box 111
Thermopolis, WY 82443-0111
(307) 864-2318
marshall@kellerlawpc.com

Philip A. Nicholas, WSB #5-1785
Meggan J. Nicholas, WSB #7-4856
Nicholas & Tangeman, LLC
P.O. Box 928
Laramie, WY 82073
(307) 742-7140
nicholas@wyolegal.com
Attorneys for Plaintiff Starkie J. Cornett

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

STARKIE J. CORNETT,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 22-CV-00034
)	
PARK COUNTY BOARD OF COUNTY)	
COMMISSIONERS and its PARK COUNTY)	
ROAD AND BRIDGE DIVISION OF THE)	
PUBLIC WORKS DEPARTMENT,)	
)	
Defendants.)	

PLAINTIFF'S DESIGNATION OF EXPERT WITNESS
PURSUANT TO FED. R. CIV. P. 26(A)(2)

COMES NOW the Plaintiff, by and through her undersigned attorney, Marshall E. Keller, of Keller Law Firm, P.C., pursuant to Federal Rules of Civil Procedure 26(a)(2), and hereby designate the following expert witness who may be called to render opinions at the trial of this matter, as follows:

SPECIALLY RETAINED EXPERT WITNESS
PURSUANT TO F.R.C.P 26(A)(C)

- 1. Jeffrey E. Nehls, M.A.**
Pacey Economics, Inc.
3005 Center Green Drive
Suite 200
Boulder, CO 80301
Phone: (303)530-5333

Attached hereto as Exhibit A (along with the Exhibits thereto) are the following documents related to this designation of expert Jeffrey E. Nehls, M.A.

- A. Mr. Nehls' qualifications, as detailed in his curriculum vitae.
- B. Mr. Nehls' report containing and describing opinions held in this matter.
- C. Mr. Nehls' prior testimonies subject to Rule 26 disclosure.
- D. Mr. Nehls' publications subject to Rule 26 disclosure.
- E. Mr. Nehls' hourly rate for work as an expert witness in preparing reports, time spent during preparation for testimony at deposition or trial, and for time spent testifying as a witness at deposition or trial are as reflected in Exhibit A.

Mr. Nehls is expected to testify in accordance with the opinions, findings and conclusions contained in his report, as well as any deposition that he may undergo in the future relative to this litigation.

GENERAL PROVISIONS

1. All opinions of the expert witnesses set forth herein are and will be to the required degree of probability pursuant to applicable law in the witness's field of expertise.
2. This designation is intended to supplement any and all interrogatories and requests for production of documents propounded by the Defendants, as well as any deposition of a particular witness.
3. The experts listed herein may criticize, comment upon, and/or rebut the deposition testimony, trial testimony, and/or data/reports, written materials and/or any raw data or testing materials produced and/or compiled in this case by the expert(s) or other witnesses designated or called by any of the Defendants.
4. Plaintiffs reserve the right to call any expert designated by any of the Defendants in this case, whether retained or withdrawn as an expert.

5. Because discovery, depositions and document exchange are ongoing, Plaintiffs reserve the right to supplement this designation by giving opposing counsel notice of additional opinions that may be generated from newly discovered and/or produced evidence or depositions.

SUPPLEMENTAL DESIGNATION RESERVED

Plaintiffs reserve the right to supplement this designation of expert witnesses pending ongoing discovery or review of additional discovery not yet obtained or which will be provided later in the case.

EXPERT DESIGNATION BY THE DEFENDANTS

Plaintiffs reserve the right to call any, and all expert witnesses identified by Defendants.

REBUTTAL EXPERTS

Plaintiffs reserve the right to designate rebuttal testimony from experts identified in this disclosure, as well as the right to designate additional experts as reasonable and necessary to provide opinions and/or rebuttal testimony in response to opinions advanced by discovery or designations obtained from Defendants' expert(s), as permitted by the Court and the Federal Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this 16th day of February 2024.

/s/ Marshall E. Keller
Marshall E. Keller, WSB #7-6406
Keller Law Firm, PC
Attorney for Plaintiff
P.O. Box 111
Thermopolis, WY 82443-0111
(307) 864-2318
marshall@kellerlawpc.com

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of February 2024, I served the above and foregoing *Plaintiff's Designation of Expert Witness Pursuant to Fed. R. Civ. P. 26(a)(2)* on the Defendants by depositing a true and correct copy thereof in the United States Mail, postage prepaid addressed to

Thomas A. Thompson
6844 Yellowtail Road
Cheyenne, WY 82009
tthompson@lglp.net

☒ U.S. MAIL

☒ EMAIL

/s/ Marshall E. Keller
Marshall E. Keller